



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

NOV 24 2008

Mr. Tracy Parker  
Mr. Jack G. Peterson  
Draft Geothermal Leasing PEIS  
c/o EMPSi  
182 Howard Street, Suite 110  
San Francisco, CA 94105-1611

Dear Mr. Peterson and Mr. Parker:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Programmatic Environmental Impact Statement (FPEIS) for Geothermal Leasing in the Western United States (CEQ #20080429) pursuant to the National Environmental Policy Act, and Section 309 of the Clean Air Act. Our comments highlight areas in the Final EIS related to issues EPA raised in its comments on the Draft EIS.

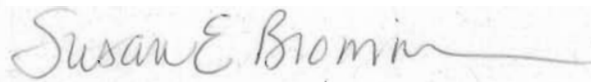
The Final EIS was prepared to support pending decisions by the Bureau of Land Management (BLM) and the U.S. Forest Service (FS) on pending geothermal lease applications covering 192 million acres, and to facilitate decisions on other existing and future lease applications and nominations covering a total area of 248 million acres. The Final EIS evaluated three alternatives, including; no action; potential leasing of 192 million acres for both direct and indirect use (preferred alternative); and leasing within a 20-mile corridor from existing transmission lines for commercial electrical generation. The preferred alternative's project area covers 12 states and will amend 122 BLM land use plans.

While the FPEIS adequately addressed our concerns about potential adverse air quality and noise impacts, EPA still has concerns related to groundwater quantity and quality, especially where there are sole source aquifers and protected geothermal resources. In particular, there is a potential for the mixing of geothermal fluids from re-injection with surface or groundwater by connections through the existing underground fault system. Accordingly, EPA recommends that the Record of Decision (ROD) outline a process that will allow BLM/FS to incorporate the results from any existing groundwater flow analyses into the decision making process before leasing potential geothermal resource areas and to complete groundwater flow analysis for site specific projects before drilling occurs.

In a related matter, to ensure protection of the 23 sole-source aquifers located in the planning area from potential adverse impacts from geothermal development, we recommend the ROD provide mitigation measures to specifically protect sole-source aquifers.

We appreciate the opportunity to provide comments and if I can provide any additional information please contact me at (202) 564-5400 or you can contact Jessica Trice of my staff at (202) 564-6646.

Sincerely,

A handwritten signature in cursive script that reads "Susan E. Bromm". The signature is written in dark ink and includes a long, horizontal flourish at the end.

Susan E. Bromm  
Director  
Office of Federal Activities